

WIPP

Comments

L-0044/022

CRD, 3.80 Original comment #17 asked if TRUM [transuranic mixed] was considered and analyzed in the scope of the EIS. DOE's response was that since TRU-M was going to WIPP without treatment, they did not make a distinction between TRU and TRU-M. Section 2.1.3 addresses this, and states they expect that WIPP will take RH waste by 2005. The issue of whether the LDR storage prohibition applies to continued storage of Hanford TRU-M is currently in litigation. The EIS should not assume treatment will not be required; moreover, no mention was made about restrictions for PCB or ignitable/reactive wastes.

Response

The discussion in the HSW EIS is based on DOE's understanding of applicable law. Should there be changes in applicable law, DOE will propose actions to comply with such revised requirements.

The 1996 amendments to the WIPP Land Withdrawal Act exempted TRU mixed waste designated for disposal at WIPP from specific treatment standards and land disposal prohibitions of hazardous waste laws. Based on experience with TRU waste now being sent to WIPP (contact handled, mixed and non-mixed), it is anticipated that most TRU and TRU mixed waste would meet WIPP waste acceptance criteria without the need for substantial additional processing. Permitting of TRU waste disposal at WIPP is discussed in Volume I Section 2.1.3. Processing and certification of TRU to meet WIPP waste acceptance criteria is discussed in Volume I Section 2.2.2.

EPA authorization to dispose of RH-TRU waste at WIPP is pending. Approval of the permit by New Mexico Environment Department is expected in the FY 2006 timeframe.

EPA has granted WIPP authorization to dispose of polychlorinated biphenyls (PCBs). In March 2002, WIPP applied for changes to its permit to allow it to dispose of waste containing PCBs. Approval of the permit revision by the New Mexico Environment Department is pending. Based on the assumption that the changes will be accepted, PCB treatment would not be required. See Volume I, Section 2.1.3.

Comments

L-0044/083

Sec. S.5, pp. S.19-21 The statement at the bottom of p. S.19, continuing at the top of S.21, should be amended to indicate that storage of RH TRU at Hanford will continue after WIPP is certified to receive such wastes if any characterization, treatment or packaging is required at Hanford, since Hanford's capability to undertake these tasks is not scheduled until well after DOE's scheduled 2005 WIPP RH TRU waste acceptance date.

Response

EPA authorization to dispose of RH-TRU waste at WIPP is pending. Approval of the permit by New Mexico Environment Department is expected in the FY 2006 timeframe.

EPA has granted WIPP authorization to dispose of polychlorinated biphenyls (PCBs). In March 2002, WIPP applied for changes to its permit to allow it to dispose of waste containing PCBs. Approval of the permit revision by the New Mexico Environment Department is pending. Based on the assumption that the changes will be accepted, PCB treatment would not be required. See Volume I, Section 2.1.3.

WIPP

Comments

L-0044/097

CRD, p. 3.18 Original comment #52 questions DOE's assumption that WIPP will take PCBs and suggests that EIS considerations should be made based on existing conditions. DOE's response that EPA has indicated acceptance, but the final decision has not been made. DOE sticks to their assumptions.

Response

EPA has granted WIPP authorization to dispose of polychlorinated biphenyls (PCBs). In March 2002, WIPP applied for changes to its permit to allow it to dispose of waste containing PCBs. Approval of the permit revision by the New Mexico Environment Department is pending. Based on the assumption that the changes will be accepted, PCB treatment would not be required. See Volume I Section 2.1.3.